

1 PHILLIP A. TALBERT  
United States Attorney  
2 SAM STEFANKI  
Assistant United States Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700  
Facsimile: (916) 554-2900  
5

6 Attorneys for Plaintiff  
United States of America  
7

8 IN THE UNITED STATES DISTRICT COURT  
9  
EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, CASE NO. 2:20-CR-00213-KJM  
11 Plaintiff,  
12 v.  
13 CHALONER SAINTILLUS,  
14 Defendant.

15  
16 The United States of America (the “government”) respectfully requests that the Court deny  
17 defendant Chaloner Saintillus’s most recent efforts to dismiss the criminal charges against him.  
18 Saintillus’s filings advance a meritless view of the Court’s jurisdictional power that should be  
19 summarily rejected.

20 **I. FACTUAL AND PROCEDURAL BACKGROUND**

21 Saintillus is charged by indictment with one count of conspiracy to distribute controlled  
22 substances and four counts of distributing controlled substances. ECF No. 5. These charges stem from  
23 Saintillus’s distribution via the dark web of controlled substances such as heroin, oxycodone,  
24 oxymorphone, and fentanyl. ECF No. 1; ECF No. 5.

25 On February 17, 2022, Saintillus filed a handwritten document titled, “Motion: To Compel/  
26 Notice of Default.” ECF No. 84. This filing demanded the indictment be dismissed with prejudice due  
27 to a purported failure—presumably by the government and not the Court—to respond to not one but all  
28 ECF ... No. 8, No. 70, No. 71, No. 72, No. 73.” ECF No. 84 at 1 (alteration in original). Saintillus’s

1 request also reiterated the argument raised in previous filings that the Court has no jurisdiction over  
2 Saintillus because he is “the holder in due course and equitable title holder of the vast Moorish Haitian  
3 American national estate.” ECF No. 84 at 2. Saintillus’s rationale that his status as a Moorish citizen  
4 deprives the Court of jurisdiction to hear this criminal case underpins many of his other recent filings.  
5 See, e.g., ECF Nos. 77, 79, 81, 86–89, 92–101.

6                   **II.        ARGUMENT**

7 Saintillus provides no valid grounds upon which to dismiss the indictment against him. The  
8 Court should therefore deny his most recent motion and its various supplements.

9                   **A.        The Government Responded to All Relevant Filings.**

10 Saintillus’s argument that the indictment should be dismissed because of a purported failure on  
11 the government’s part to respond to some of his serial filings is meritless. See ECF No. 84 at 1  
12 (containing Saintillus’s request to dismiss indictment based on lack of response to docket entries 8 and  
13 70 through 73). On February 11, 2022, the government filed an opposition brief opposing Saintillus’s  
14 requests as contained in docket entries 8, 71, 72, and 73. ECF No. 80. The government’s opposition  
15 brief did not mention docket entry 70 because that particular filing is a notice filed by Saintillus’s prior  
16 appointed counsel requesting that said counsel “be removed as counsel of record and removed from the  
17 service list of actions” in this case. ECF No. 70 at 1.

18 Accordingly, the government’s prior filing at docket entry 80 addressed all of Saintillus’s then-  
19 ripe arguments for dismissal of the charges against him.

20                   **B.        The Court Has Jurisdiction to Preside Over This Case.**

21 Saintillus appears to argue, again, that the Court should dismiss the indictment because it has no  
22 jurisdiction over him. See ECF No. 84 at 1 (arguing that a court which “lacks personal jurisdiction, is  
23 also a court without power to issue an *in personam* judgement”). He cites various legal authorities for  
24 this claim, including non-criminal cases from the 1800s as well as the Thirteenth and Fourteenth  
25 Amendments. ECF No. 84 at 1–2. What can be deciphered of Saintillus’s numerous jurisdictional  
26 assertions boils down to the argument that the Court has no jurisdiction over him because “I’m the  
27 holder in due course and equitable title holder of the vast Moorish Haitian American national estate.”  
28 ECF No. 84 at 2.

The Court has jurisdiction over this case because Saintillus is charged with a violation of federal criminal law and the “district courts of the United States shall have original jurisdiction, exclusive of the courts of the States, of all offenses against the laws of the United States.” 18 U.S.C. § 3231. Since Saintillus is charged with just such a violation of the laws of the United States, the Court has jurisdiction over him and over the criminal case in which he is a named defendant. *See* ECF No. 5 (containing charged violations of federal criminal law).

Saintillus's other assertions are meritless and repetitive arguments derived from a so-called Moorish-American belief system that courts across the country uniformly reject. *See, e.g., Bey v. Gascon*, No. 19-CV-03184-WHO, 2019 WL 5191012, at \*5 (N.D. Cal. Oct. 15, 2019) (collecting cases in which courts rejected Moorish-American claims to being outside federal district court jurisdiction). The Court should do the same here. Furthermore, given the frequency and repetition of his filings, the Court should also consider admonishing Saintillus to stop claiming that his self-proclaimed status as a Moorish-American somehow removes him from the Court's jurisdiction to hear this criminal case against him.

### III. CONCLUSION

The Court should deny Chaloner Saintillus's most recent motion to dismiss and its various supplements.

Dated: March 21, 2022

PHILLIP A. TALBERT  
United States Attorney

By: /s/ SAM STEFANKI  
SAM STEFANKI  
Assistant United States Attorney